

EXHIBIT 10

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

RHODE ISLAND COALITION AGAINST
DOMESTIC VIOLENCE, *et al.*

Plaintiffs,

v.

PAMELA BONDI, in her official capacity as United
States Attorney General, *et al.*

Defendants.

Case No. 1:25-cv-00279

DECLARATION OF GUADALUPE LOPEZ

I, Guadalupe Lopez, declare as follows:

I. Background

1. I am the Executive Director of Violence Free Minnesota, Minnesota's federally designated domestic violence coalition.

2. Violence Free Minnesota was founded in 1978 and is based in Saint Paul, Minnesota. Violence Free Minnesota is composed of over 90 member programs across the State that are aimed at ending relationship abuse. The coalition represents victims and survivors of relationship abuse; leads public policy advocacy and social change efforts; and offers support, education, and opportunities for connection for members.

3. Violence Free Minnesota's mission is to represent victim/survivors of relationship abuse and member programs; challenge systems and institutions; promote social change to prevent domestic violence; and support, educate, and connect member programs. Our vision is to end relationship abuse, create safety, and achieve social justice for all.

4. Violence Free Minnesota is the state's primary resource for information, training, and technical assistance around domestic violence. As the state's domestic violence coalition, we are made up of 92 member programs providing direct services to victim/survivors in all 87 counties in Minnesota. Over the last decade, our work to end domestic violence in Minnesota has centered racial justice. Violence Free Minnesota has a statement, developed by staff and board, that we use both internally and externally to describe the ways in which we center racial justice work in all of our programming. Violence Free Minnesota is also the only agency in the state that tracks and reports on all intimate partner violence homicides that occur in our state, and we have been doing this for over 35 years, culminating in an intimate partner violence ("IPV") homicide report each year and a memorial each year to honor the victims and their families.

5. Violence Free Minnesota also has a policy and legal systems program area that works with member programs, criminalized survivors, and systems personnel in order to both improve system responses to domestic violence and to work to build alternative responses to domestic violence that are outside traditional systems, like restorative justice circles that are driven by the victim's needs in response to the violence, and community-based responses that individual communities determine. This program area also provides training to systems personnel around the lived experiences of marginalized and underserved victim/survivors, including BIPOC communities, the LGBTQ2S+ community, people with disabilities, rural communities, and more. These trainings include truth telling around historical trauma and social and system inequities rooted in colonialism and white supremacy and patriarchy, and the way these systems have and continue to harm victims/survivors. Violence Free Minnesota also has a strong policy program that informs and educates policymakers on the needs of victim/survivors,

and on creating policies and practices that are responsive to the needs of survivors, trauma-informed, and based in best practices.

6. Violence Free Minnesota has an annual budget of approximately \$1.3 million. Of that total amount, approximately \$1 million comes directly from federal funds. Violence Free Minnesota receives \$254,737 from Office on Violence Against Women (OVW) grants annually.

II. Violence Free Minnesota Member Organizations

7. Violence Free Minnesota is a membership organization with 92 member agencies. Members fall into one of two categories: (1) voting members; and (2) “supportive non-voting” organizational memberships. Voting members of the coalition must be incorporated as a Minnesota non-profit organization or tribal organization; be a program designed primarily to serve victims/survivors of relationship abuse and their children; be an organization that provides crisis intervention, advocacy, protective housing, referrals, peer support, and/or children’s services; or be an organization that supports and promotes the mission statement and core values of Violence Free Minnesota. Supportive non-voting members are nonprofit; health and education organizations; tribal, state, and local governments; and other organizations that pay dues and support and actively promote the mission statement and core values of Violence Free Minnesota.

8. Violence Free Minnesota’s 92 member programs provide a variety of essential services to victim//survivors and their families who are in crisis and have experienced trauma. Violence Free Minnesota has a large number of members that provide culturally-specific victim services programs that respond to the direct needs of communities in a way that is culturally responsive, leading to better outcomes, holistic support, and healing for underserved communities. Other programs provide much needed support in rural and small town communities that are often isolated from easily accessible resources and support. For example,

one member program covers a 9 county area with only 2 advocates in that region of the state. Other programs provide immediate shelter for victim/survivors—sometimes including hotel or motel stays —while others provide transitional housing support. Others provide legal assistance, including assistance in filing orders for protection, support in custody cases for victim/survivors, and more. Finally, some member programs provide restorative justice and domestic abuse transformation programming to provide a pathway both for accountability and to change the behavior of those that have caused harm, and to prevent future harm and violence from occurring again. These are just a few small examples of some of the services member programs provide that are essential for public safety in our state.

III. Grants Violence Free Minnesota Has or Has Intended to Apply For

9. Violence Free Minnesota has applied for and received a formula grant from OVW for the State and Territory Domestic Violence and Sexual Assault Coalitions Program (“Coalition Grant”) every year since it became a formula grant.

10. Most recently, OVW awarded Violence Free Minnesota \$114,533 through the Coalition Grant in FY24. The grant has a period of performance and a budget period of October 1, 2024 through September 30, 2025. The Coalition Grant represented eight percent of Violence Free Minnesota’s annual budget.

11. Violence Free Minnesota has used Coalition Grant funds to support its education and training regarding policy that impacts survivors, its work to build capacity for staff and member programs, regional meetings (quarterly) with member programs, and technical assistance to member programs. Violence Free Minnesota convenes a monthly domestic violence collaborative meeting that brings together representatives from multiple state agencies, the courts, county attorneys association, and Minnesota’s other crime victims coalition. We also host

monthly program directors' meetings for peer support, resource sharing and technical assistance on emerging issues; and convene a member program intimate partner homicide working group which collectively monitors media stories on intimate partner violence homicides in Minnesota,, gathers court and other public data, maintains a thorough tracking system of these homicides statewide, and supports community events and member programs impacted by IPV homicide. For the upcoming OVW grant cycle (October 1, 2025 through September 30, 2026), Violence Free Minnesota has intended to apply for the FY25 Coalition Grant. If awarded the Coalition Grant, as expected, Violence Free Minnesota would receive \$113,574. Coalition Grant applicants must submit a certification by June 23, 2025 at 11:59 PM ET and submit the final application by June 25, 2025 at 8:59 PM ET.¹ If awarded this Grant, Violence Free Minnesota would be able to continue to convene, connect, and collaborate with member programs, systems partners, policy makers, state agencies, sibling coalitions, and others and continue serving as the state's primary voice and resource around domestic violence.

12. If Violence Free Minnesota could not obtain the Coalition Grant, we would have to eliminate one current staff position—at the very least. But this OVW funding funds more than just staff salaries. Violence Free Minnesota, when charging salaries through this grant, also budgets for overhead allocations. A loss of OVW funds would impact the coalition's overhead (rent, technology and subscriptions necessary to do our work, and more) that would now need to be relocated. There is also dedicated funding in this grant for staff travel to trainings and conferences in order to keep staff informed and up to date on best practices and emerging issues and responses in the field. Not having access to participate in these trainings would impact the

¹ Violence Free Minnesota applied for the Coalition Grant by this deadline. Pursuant to a stipulation filed in this matter, Violence Free Minnesota and its members are not required to submit a certification for any OVW grant until August 12. Absent judicial relief, we will be required to submit a certification at that time.

coalition's staff's ability to provide our programming and services to member programs. This would ultimately impact survivors as well, because if Violence Free Minnesota staff would not be able to train survivor-serving member programs on the best practices for care and prevention that will directly impact the survivors they serve. Violence Free Minnesota also uses part of the OVW Coalition grant for interpretation needs of our member program and advocates – particularly for the deaf and hard of hearing folks in our membership.

IV. Grants That Violence Free Minnesota Members Currently Have or Have Intended to Apply For

13. Violence Free Minnesota members have also received OVW grants.

14. Various Violence Free Minnesota members have also intended to apply for OVW grants this year.

15. For example, some membership organizations have received the OVW Legal Assistance for Victims (LAV) Grant. They use this grant to support victim/survivors in litigation and the court process, including in receiving protection orders against their assailants and supporting participation as a victim in a criminal prosecution. Survivor clients routinely report that the support they received from the LAV attorney was pivotal to their experience in pursuing safety and justice.

16. Other member organizations have received the OVW Training and Technical Assistance Grant. They use this grant to strengthen and build the capacity of justice system professionals and victim service providers to effectively respond to sexual violence and to foster partnerships among organizations that have not traditionally worked together to address such crimes. Through improved partnerships, survivors experience a more supportive process in seeking accountability and justice from the person who caused them harm as well as in their process of healing. With improved survivor experience, there are more successful prosecutions

of crimes of sexual violence and survivors are able to heal and resume their employment, education, and personal life responsibilities and goals faster.

V. OVW's New Funding Conditions

17. The Notices of Funding Opportunity (NOFOs) for the FY25 OVW grants for which Violence Free Minnesota and its members have intended to apply include new “out-of-scope” funding conditions that differ significantly from the conditions imposed on the use of federal funds under the same grant awards for prior fiscal years. Specifically, the NOFOs for the FY25 OVW grants prohibit grant funds from being used for: (1) promoting or facilitating the violation of federal immigration law; (2) inculcating or promoting gender ideology; (3) promoting or facilitating discriminatory programs or ideology, including illegal DEI and “diversity, equity, inclusion, and accessibility” programs that do not advance the policy of equal dignity and respect; (4) activities that frame domestic violence or sexual assault as systemic social justice issues rather than criminal offenses; (5) programs that discourage collaboration with law enforcement or oppose or limit the role of police, prosecutors, or immigration enforcement in addressing violence against women; (6) awareness campaigns or media that do not lead to tangible improvements in prevention, victim safety, or offender accountability; (7) initiatives that prioritize illegal aliens over U.S. citizens and legal residents in receiving victim services and support; and (8) any activity or program that unlawfully violates an Executive Order. In addition to identifying these activities as “out-of-scope activities” for which grant funds may not be used, the NOFOs for the FY25 OVW grants require applicants to submit a certification with their application saying that they will not use the grant funds on the “out-of-scope” activities.

18. In addition, OVW has updated the General Terms and Conditions applicable to its grants and cooperative agreements for fiscal year 2025 to require a separate certification as a term of each award. The term requires a grant recipient to agree that “its compliance with all applicable federal civil rights and nondiscrimination laws is material to the government’s decision to make th[e] award and any payment thereunder, including for purposes of the False Claims Act.” The term further states that “by accepting the award,” the grantee “certifies that it does not operate any programs,” including DEI programs, “that violate any applicable federal civil rights nondiscrimination laws.”

VI. OVW’s New Funding Conditions Place Violence Free Minnesota and its Members in an Untenable Position

19. The new funding conditions present Violence Free Minnesota and its members with an impossible choice. Violence Free Minnesota could forgo applying for OVW grants and face the direct consequences to Violence Free Minnesota’s financial health and ongoing operations. Or Violence Free Minnesota may apply and jeopardize its mission and compliance with VAWA requirements, and face enormous risks of litigation and government investigations under the False Claims Act no matter what Violence Free Minnesota does.

20. Agreeing to the certifications would cause Violence Free Minnesota profound harm. The funding conditions are vague, and several could be read to conflict with Violence Free Minnesota’s core mission and the activities it has undertaken for decades in furtherance of that mission and in reliance on OVW grants. The funding conditions may require Violence Free Minnesota to cease engaging in activities that it had previously understood OVW grants to plainly support. Thus, Violence Free Minnesota does not know how it may comply with the funding conditions while also staying true to its mission and providing essential support for

member organizations, advocates, and vulnerable victims and survivors of domestic abuse and sexual violence.

21. For instance, Violence Free Minnesota's mission is "to end relationship abuse, create safety, and achieve social justice for all." Violence Free Minnesota is unsure whether it may undertake its day-to-day activities reflecting its mission and guiding principles, which reference "social justice," without running afoul of the condition not to "promot[e] or facilitat[e] discriminatory programs or ideology, including illegal DEI" as DOJ might interpret those terms. It is also unclear whether Violence Free Minnesota's mission and guiding principles, which recognize that the criminal offense of domestic violence carries a systematic social justice element, violate the anti-social justice part of the certification, and whether Violence Free Minnesota could comply with the anti-social justice condition without adopting a view antithetical to its true beliefs.

22. Many of Violence Free Minnesota activities in furtherance of its OVW grant-funded direct service programs may also conflict with the new funding conditions. For instance, Violence Free Minnesota incorporates racial justice in all of our work internally and with member programs, including specific sessions and commitments we require of member programs to ensure culturally responsive and respectful service provision to survivors. We also host trainings for member programs on serving LGBTQ2S+ survivors, survivors with disabilities, and other survivors with marginalized and multiple identities in order to ensure all survivors are treated with dignity and respect. Violence Free Minnesota is unsure if it may continue its racial justice and racial equity work, because the coalition does not know if it would be construed as "promoting or facilitating discriminatory programs or ideology, including illegal DEI" as DOJ might interpret those terms.

23. Violence Free Minnesota's core mission includes social justice and challenging oppressive systems that have historically harmed marginalized communities (including communities of color, Native communities, LGBTQ2S+ communities, and disability communities). With the new conditions on funding, Violence Free Minnesota is unsure if it can continue its work that focuses on alternatives to the criminal justice system for survivors, including restorative justice, community accountability, and other non-traditional supports outside of the criminal legal system. For instance, some of Violence Free Minnesota's member programs provide therapy for those who have used harm and for the children who have witnessed or experienced violence themselves; or healing circles that are driven by the needs of survivors to heal and hold harm-doers accountable.

24. Violence Free Minnesota is also concerned that it cannot continue to engage in certain practices that respect the dignity of all victims of domestic violence, regardless of gender and sexual orientation, and are consistent with the VAWA mandate not to discriminate on the basis of gender or sexual orientation. In providing direct client services, many Violence Free Minnesota staff and programs use clients' preferred pronouns. The organization also provides information about addressing the needs of the LGBTQ+ community, such as training on best practices in serving this community (like using victim/survivors correct pronouns, and ensuring there are policies in place that keep victims/survivors safe inside and outside of shelter, and more). It is unclear whether Violence Free Minnesota may continue these practices and activities while complying with the funding condition not to "inculcat[e] or promot[e] gender ideology."

25. It is also unclear whether Violence Free Minnesota may continue providing certain services to the immigrant community, including those without legal status, consistent with the funding conditions. Violence Free Minnesota regularly supports member programs that

help immigrant clients understand their rights and obtain appropriate legal assistance. This includes providing member programs with specific education around the VAWA and crime-victim specific immigration opportunities and protections that may be available regardless of current status. But doing so now may conflict with the way DOJ interprets the prohibition against “promoting or facilitating the violation of immigration law.”

26. Violence Free Minnesota fears that if it agrees to the new funding conditions, it could face not only the loss of grant funds, but federal government investigation, private party litigation under the False Claims Act, and potential liability for not complying. These potential consequences of seeking a grant subject to the new, vague conditions make Violence Free Minnesota concerned about applying or accepting an award. To mitigate these risks, Violence Free Minnesota would have to change its practices, in many cases contrary to its core values.

27. Not agreeing to the certifications would result in equally grave harm.

28. Not having access to funds from the Coalition Grant and other competitive grants would severely undermine Violence Free Minnesota’s ability to function as a state coalition. Losing the Coalition Grant alone would result in a \$113,574 loss of funds for the next fiscal year. Without these funds, Violence Free Minnesota would have to reduce the size of its staff and, therefore, its services to members.

29. Our member programs would lose access to core, comprehensive training for their staff necessary to provide legally and ethically compliant advocacy services to clients in addition to regular training on emergent issues that ensure front-line staff are able to provide quality services to all survivors. The state would lose critical technical assistance in systemic response improvements that reduce domestic violence, increase effectiveness of legal responses, and dramatically improve survivor response and support efforts. These losses would make Violence

Free Minnesota less effective as a coalition and undermine its role as the state authority on sexual violence prevention, intervention, and response.

30. Not having access to funds from the Coalition Grant and other competitive grants would severely undermine Violence Free Minnesota's ability to function as a state coalition. The organization would have to shut down at least some of its programming, including providing training to programs and advocates on best practices around serving survivors, as well as training to legal systems providers around appropriate responses to victims who have experienced domestic violence. These are just some of the ways Violence Free Minnesota's programming and its beneficiaries would suffer.

VII. Cuts to Violence Free Minnesota and its Members' Services Would Harm Domestic Violence Victims and Survivors

31. The reduction or outright termination of these services would have devastating effects on the community of survivors and victims of domestic violence.

32. In the absence of fully funded Violence Free Minnesota services, domestic violence victims will be confronted with more barriers when trying to access services following their assault, including discriminatory treatment from medical, law enforcement or courtroom personnel, hotline operators, and therapists who have not received anti-bias and other core victim services training. This will immediately lead to more survivors choosing not to participate in the criminal justice system and fewer being linked to and receiving appropriate medical, therapy, and other critical services. Direct service providers will be unable to maintain high quality services that follow best practice guidance or even that are fully compliant with the myriad federal, state, and local requirements they would now have to navigate on their own, without the critical assistance of coalitions, while desperately trying to keep up with the already increasing demand for services.

33. Violence Free Minnesota's operations are essential to permitting the network of direct service providers to focus on providing the highest-quality services to the survivors they serve and ensuring that the systems that contribute to addressing and responding to the epidemic of domestic violence are operating with evidence-based, trauma-informed, survivor-centered policies and practices.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 26th, 2025.

Guadalupe
Lopez

Guadalupe Lopez
Executive Director
Violence Free Minnesota

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